

## **REMARKS**

Claims 1-89, 108-118 and 120-141 were pending in the present application when this Office Action was mailed (April 26, 2005). In this response, claims 128 and 137 have been amended and claims 142 and 143 have been added. Accordingly, claims 1-89, 118, and 120-143 are currently pending.

In the April 26, 2005 Office Action, all claims except claims 22, 128 and 137 were indicated to be allowed or allowable if rewritten to be in independent form. More specifically, the status of the application is as follows:

(A) Claims 128 and 137 stand rejected under 35 U.S.C. § 112, first paragraph;

(B) Claim 22 stands rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,722,942 to Lansford et al. ("Lansford"); and

(C) Claims 1-21, 33-89, 108-118, 120-127, 129-136 and 138-141 are allowed, with claims 23-32 indicated to be allowable if rewritten to be in independent form.

### **A. Response to the Section 112 Rejection**

Without commenting on or conceding the merits of the Examiner's Section 112 rejection, claim 128 has been amended to eliminate the reference to aluminum, and claim 137 has been amended to eliminate the reference to platinum. Accordingly, the Section 112 rejections to these claims should be withdrawn. New claims 142 and 143 have been added to include the aluminum and platinum features, respectively. In accordance with the Examiner's indication that the specification is enabling for these materials, new claims 142 and 143 (which depend from allowed independent claim 127) should be allowed.

### **B. Response to the Section 102 Rejection of Claim 22**

Claim 22 is directed to a method for removing conductive material from a microelectronic substrate by engaging a face surface of the substrate with a polishing surface of a polishing pad, disposing a liquid adjacent to the polishing surface of the

polishing pad, electrically coupling the conductive material to a source of electrical potential, and moving at least one of the microelectronic substrate and the polishing pad relative to the other while the polishing surface is engaged with the microelectronic substrate. The liquid adjacent to the polishing surface of the polishing pad includes at least one of  $(\text{NH}_4)_2\text{SO}_4$ ,  $\text{K}_2\text{SO}_4$ ,  $\text{H}_2\text{SO}_4$ ,  $\text{MgSO}_4$ ,  $\text{H}_3\text{PO}_4$ , and ammonium citrate.

The Examiner alleges that Lansford, which discloses use of ammonium persulfate in connection with a material removal process, anticipates claim 22. However, as identified in the material safety data sheets included in an IDS accompanying the present response, ammonium persulfate has a chemical formula of  $(\text{NH}_4)_2\text{S}_2\text{O}_8$ , and is not included in claim 22. Claim 22 instead includes ammonium sulphate. Accordingly, Lansford's disclosure of ammonium persulfate fails to anticipate at least one element of claim 22, and no evidence of any motivation to modify Lansford's disclosed chemical to include the features of claim 22 has been provided. Therefore, the Section 102 rejection of claim 22 should be withdrawn.

C. Response to the Indication of Allowable Subject Matter

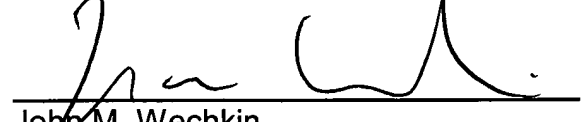
None of the allowed claims have been amended in the present response. Claims 23-32, which were objected to as being dependent upon a rejected base claim, should now be allowed as being dependent upon allowable base claim 22. Claims 128 and 137 were indicated to be allowable if rewritten to overcome the Section 112 rejections and to include the limitations of the base claim than any intervening claims. Claims 128 and 137 have been amended to overcome the Section 112 rejections. These claims both depend from allowable claim 127. Accordingly, it is not clear why these claims would need to be rewritten to be in independent form, as these claims currently depend from an allowable base claim.

D. Conclusion

In view of the foregoing, the claims pending in the application comply with the requirements of 35 U.S.C. § 112 and patentably define over the applied art. A Notice of Allowance is, therefore, respectfully requested. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-3257.

Respectfully submitted,

Perkins Coie LLP



John M. Wechkin

Registration No. 42,216

Date: July 26, 2005

**Correspondence Address:**

Customer No. 25096

Perkins Coie LLP

P.O. Box 1247

Seattle, Washington 98111-1247

(206) 359-8000